

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CRAIG GOULET,)	CASE NO. 04-12577 JLT
)	
Plaintiff,)	
)	
vs.)	UNOPPOSED MOTION FOR
)	ADMISSION <i>PRO HAC VICE</i>
NEW PENN MOTOR EXPRESS, INC.,)	
et. al.,)	
)	
Defendants.)	

Pursuant to Local Rule 83.5.3 of the United States District Court for the District of Massachusetts, Defendant New Penn Motor Express, Inc. (“Defendant”) hereby moves this Court to grant Carl H. Gluek leave to appear and practice in this Court *pro hac vice*. As grounds for this motion, Defendant states as follows:

1. Frank A. Libby, Jr. and Nicholas A. Klinefeldt, attorneys at Kelly, Libby & Hoopes, P.C., are members in good standing of the Bar of the Supreme Judicial Court of the Commonwealth of Massachusetts and of the Bar of the United States District Court for the District of Massachusetts. Mr. Libby and Mr. Klinefeldt have filed appearances in these actions.
2. Mr. Gluek is an attorney with the law firm of Frantz Ward LLP, 55 Public Square Building, 19th Floor, Cleveland, Ohio 44113.
3. Mr. Gluek is not a member of the Massachusetts Bar or the Bar of the United States District Court for the District of Massachusetts.
4. Mr. Gluek has met the requirements to practice in the United States District Court for the District of Massachusetts, as set forth in L.R. 83.5.3. *See* Certificate of Carl H. Gluek (attached hereto as Exhibit A).

WHEREFORE, Defendant respectfully requests that this Court grant this motion to admit Carl H. Gluek, *pro hac vice*.

Respectfully submitted,

/s/ Nicholas A. Klinefeldt
Frank A. Libby, Jr. (BBO # 299110)
Nicholas A. Klinefeldt (BBO # 647422)
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Boston, Massachusetts 02110
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Attorneys for Defendant New Penn Motor Express, Inc.

Dated: January 26, 2005

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

I, Nicholas A. Klinefeldt, hereby certify pursuant to Local Rule 7.1(a)(2) that I have conferred with Scott A. Lathrop, Esq. of the law firm Scott Lathrop & Associates, counsel for Plaintiff, and that Plaintiff assents to this motion.

CERTIFICATE OF CARL H. GLUEK

I, Carl H. Gluek, hereby certify as follows:

1. I am a partner in the law firm of Frantz Ward LLP, 55 Public Square Building, 19th Floor, Cleveland, Ohio 44113.
2. I have been admitted to practice in the following jurisdictions in the years indicated:

State of Ohio (1985)
3. I am an attorney in good standing in all of the above jurisdictions.
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the penalties of perjury, this 25th day of January 2005.

/s/ Carl H. Gluek
Carl H. Gluek